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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PLM LENDER SERVICES INC.,
Plaintiff,

v.

ALFRED PETERS, an individual;
DEPARTMENT OF THE TREASURY-
INTERNAL REVENUE SERVICE; TAX
RECEIVER OF THE COUNTY OF
CLARK; MONTARA ESTATES
HOMEOWNERS ASSOCIATION;
REPUBLIC SILVER STATE DISPOSAL
INC. DBA REPUBLIC SERVICES;
BLOOMNET, INC.; DOES 1 through 10,
inclusive; and ROES 1 through 10,
inclusive.

Defendants.

Case No. 2:22-cv-00929-APG-NJK

**STIPULATION BETWEEN THE
UNITED STATES AND PLM
LENDER SERVICES INC. TO
EXTEND THE UNITED STATES'
RESPONSE DEADLINE**

Plaintiff, PLM Lender Services, Inc., and Defendant, the United States of America,
pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b), hereby agree and stipulate as follows:

1 1. On or about April 22, 2022, PLM Lender Services, Inc. (“Plaintiff”) initiated
2 this action in the Eighth Judicial District Court of Clark County, Nevada as case number
3 A-22-851514-C.

4 2. On May 11, 2022, Plaintiff served a copy of the Summons and Complaint on an
5 employee of the United States Attorney’s Office for the District of Nevada. *See* 28 U.S.C.
6 § 2410(b).

7 3. On June 9, 2022, the United States timely removed this case to the United States
8 District Court for the District of Nevada under 28 U.S.C. §§ 1441, 1442, 1444, and 1446.
9 Dkt. #1.

10 4. Pursuant to Fed. R. Civ. P. 81(c)(2), when a case is removed to federal court, a
11 response to the complaint must be filed within twenty-one (21) days after receiving the
12 complaint or within seven (7) days after filing the notice of removal, whichever is longer.
13 Under the Fed. R. Civ. P. 81(c)(2), the United States’ response to the Complaint is due on
14 or before June 16, 2022 which is seven days after the notice of removal was filed.

15 5. The United States and its agencies, however, normally receive sixty (60) days
16 after the date of service on the United States Attorney in which to respond to a complaint.
17 Fed. R. Civ. P. 12(a)(2).

18 6. Had this case been filed in federal court, the United States would have had sixty
19 (60) days from May 11, 2022 to respond to the complaint (i.e., July 11, 2022).

20 7. The Parties hereby agree to extend the United States’ deadline to respond to the
21 complaint to July 11, 2022. The additional time sought will allow counsel for the United
22 States to obtain relevant records from the IRS regarding its liens filed against the Subject
23 Property. This information is necessary for the United States to adequately defend its
24 interests in this case. The additional time will also allow the parties an opportunity to
25 discuss Plaintiff’s underlying claims.

26 8. Fed. R. Civ. P. 6(b) authorizes this Court to grant an extension of time to respond
27 to the Complaint for good cause shown. *See* LR IA 6-1.

28 9. This is the Parties’ first request for an extension.

1 10. By filing this Stipulation, the United States does not waive any defenses listed in
2 Fed. R. Civ. P. 12.

3 WHEREFORE, the United States and PLM Lender Services, Inc., respectfully
4 request that this Court grant their Stipulation and allow the United States until July 11,
5 2022 to answer or otherwise respond to the complaint in this case.
6

7 Dated: June 16, 2022

David A. Hubbert
Deputy Assistant Attorney General

8
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16 Dated: June 16, 2022

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ORDER APPROVING STIPULATION

The foregoing stipulation to extend Defendant United States' response deadline to the Plaintiff's Complaint is approved. The United States shall file its response to the Plaintiff's Complaint on or before July 11, 2022.

IT IS SO ORDERED.

Dated: June 17, 2022



United States Magistrate Judge